IRENE NAVIS: Good evening. My name is Irene Navis. I'm Planning Manager for Clark County's Nuclear Waste Program. I'd like to thank the Department of Energy for this opportunity to speak regarding the EIS Draft and Supplemental documents. It's my pleasure to be here in front of all of you. I understand we have an audience of about 200 people, and that's great, so thanks for being here.

My talking points will cover three important aspects related to the EIS documents. Number one is the shortcomings related to the EIS documents within the context of the entire Yucca Mountain program. Some of the key variables that will impact the project that the DOE does not appear to have adequately addressed and the key stakeholders who have provided guidance, advice, and critique to the Yucca Mountain program over the years whose views do not seem to be adequately reflected in the EIS documents.

This graphic that you see here before you demonstrate the various elements which comprise the Yucca Mountain project. These elements are supposed to form the technical, scientific, and legal basis under which Yucca Mountain will be evaluated for construction license.

As you can see from this graphic, we have serious concerns about whether these pieces actually fit together to form a cohesive, credible, licensable repository program. These long-standing concerns are

highlighted when we examine all of the elements within the context of the EIS documents that are before us today.

For example, when we look at the Draft Environmental Impact Statement for the Caliente Corridor, we may discover this as we delve deeper into the many thousands of pages of documents in that document. But we don't yet understand the relationship and relevance to the Supplemental Draft Environmental Impact Statement for the repository itself.

We don't understand fully how it links to the National Transportation Plan, the Section 180-C policy that is required to be developed as part of the Nuclear Waste Policy Act that relates to funding for public safety.

We're not sure how it all relates to the transport, age, and dispose canister specifications. And we understand and are confused by the fact that the transport, age, and dispose canister is for rail shipments only. So our big question is what if rail shipments never occur because the rail is never built? How will the truck shipments then take place?

You've heard other speakers talk about the contracts with the utilities and how oldest fuel first is supposed to be shipped. We are looking at the documents in terms of what happens when you ship the newest fuel first, which leads to higher risk, more frequent shipments, and longer above-ground storage at Yucca Mountain.

So the very problem that Yucca Mountain is trying to solve with above-ground storage will occur at Yucca Mountain itself. We want to look at this in the context of the federal budget. What happens if federal budget levels are not at a level that can withstand the project moving forward, especially the transportation element? What will be sacrificed in terms of making the project move forward if there isn't enough funding?

The total system performance assessment element, we haven't seen the revisions, so we don't know how it relates to the Environmental Impact Statement. 6

The total system life cycle cost element, which is supposed to give an estimate of the total costs of the project overtime, that's not complete either. So we don't know how that fits with all of these environmental studies. 7

The EPA standard has not yet been released in final form. 8 We don't know what's up with the second repository that is potentially proposed in terms of a report that's required by the Department of Energy, so we don't know what that means in terms of the level of waste in terms of volume of waste that will happen over time. 9

The Environmental Impact Statement talked about twice as much waste, which means twice as many shipments for twice as many years. But we don't know if that's something that is conceptual or something we have to worry about.

The Global Nuclear Energy Partnership proposed by this administration, we don't know how that all fits. That's about reprocessing and recycling of waste from other countries. We don't know how that relates to Yucca Mountain, if at all. 10

The Yucca Mountain project and its relationship to GNEP is very important, because we know so far Congress hasn't had a large appetite for funding it. And so we don't know what that means in terms of the recycling and reducing the volume of waste over time.

One of the things that we are looking at are the key variables in terms of reactor site shipping decisions, railroad operator shipping decisions, Nevada highway transportation impacts, human error, sabotage, terrorism. Weather becomes more and more unpredictable over time, and we are not clear how something as simple as figuring out what the weather will be is going to be addressed in the EIS. 11

And we also are looking at DOE's experience with other projects, both budget and performance, looking at their track record and how that applies to this program. We have many, many affected stakeholders and oversight agencies, state, local, federal, all working together trying to figure out where they fit, what their role is, and how they fit into this picture. So far it's not clear. We're looking for answers. And thank you for helping us with that. 12